

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHLOÉ, S.A.S., J. CHOO LIMITED :  
 :  
Plaintiffs, :  
 :  
- against - :  
 :  
KEN CHEN a/k/a SHU CHEN a/k/a XIANG :  
CHEN, DANIEL DOE, GODDESS :  
TRADING d/b/a :  
GODDESSTRADING@HOTMAIL.COM, :  
LUXUNG GOODS, LUXURY GOODS, :  
TERRY DOE d/b/a :  
AZNTERRY911@HOTMAIL.COM, JASON :  
DOE d/b/a JARRY326@YAHOO.COM.CN, :  
FASHION HANDBAGS, BENNY DOE a/k/a :  
YU LIN, JEANCARLO DOE, JOSEPH a/k/a :  
JOSE DOE a/k/a JOSE CHONG WEN, SISI :  
a/k/a CECI DOE, TOP LUXURY :  
HANDBAGS d/b/a :  
LUXURYHANDBAGS277@YAHOO.COM, :  
FRANCISCO DOE, BEN DOE, CARLOS :  
DOE a/k/a CARLOS RENE TSE SIO, :  
INSTYLE LUXURY HANDBAGS, LIN LIN :  
NAN a/k/a CORINA DOE a/k/a QIMIAO HU :  
a/k/a QI MIAO HU, KENNY DOE a/k/a YE :  
GUO a/k/a GUO Q YE, NEWCOME :  
TRADING d/b/a TOSCA, QUICK GLOBAL :  
SHIPPING, HOWARD EXPRESS :  
SHIPPING, RANDY DOE, JAE MAN YOO, :  
YAN HE XIA, WAI KIT WONG, CHEN LI :  
YU, CHEN X. JIANG, W. FEI ZENG, :  
CHENG CHEN, XIANXN CAI, FU :  
ALEJANDRO CHANG, WAI KIT LEW, :  
ENYI HUANG, YUE XU, SONG GAO, :  
LISA WU, JIMMY NG, TUAN PHAN, LING :  
CAI, LISA CHAN YAN FEN CHEN, P.S.K. :  
AMERICA, INC., HENG FA INC., CHEN :  
STAR GIFT SHOP, JOEY'S GIFT SHOP, :  
INC., CATSE CO., INC., SHEN XING GIFT :  
SHOP INC., NEW WEALTH TRADING, :  
INC. d/b/a TOSCA USA, TOSCA :  
HANDBAGS, NICE HANDBAGS, 265 :  
CANAL BOOTH #16, 265 CANAL BOOTH :  
#5, 265 CANAL BOOTH #4, 277 CANAL :  
ADJACENT H-3D, 421A BROADWAY, and :  
various JOHN and JANE DOES and XYZ :  
COMPANIES (UNIDENTIFIED), :  
 :  
Defendants. :

**ADVISORY TO THE COURT REGARDING STATUS OF SETTLEMENTS  
AND STATUS OF REMAINING DEFENDANTS**

Plaintiffs CHLOÉ, S.A.S. and J. CHOO LIMITED ("Plaintiffs") file this advisory to the Court in lieu of submitting a joint pre-trial order (per scheduling order dated September 12, 2007) to advise the Court of the following: a) most of the Defendants have settled; b) the status of settlements that are in the process of being finalized; c) the Defendants that continue to engage in settlement discussions; and d) Plaintiffs' intention to seek a brief extension to the trial date to finalize settlements and seek default or summary judgment against the remaining Defendants.

**A. Plaintiffs Have Fully Settled with Numerous Defendants**

The following Defendants have fully settled, and permanent injunctions have been filed with the Court:

- a) Newcome Trading, Inc. d/b/a Tosca
- b) Tosca Handbags
- c) New Wealth Trading, Inc. d/b/a Tosca USA
- d) P.S.K. America, Inc.
- e) Enyi Huang
- f) Shen Xing Gift Shop Inc. a/k/a Shen Xing Gift Chop a/k/a Chen Xing Gift Shop
- g) Howard Express Shipping, Inc. (awaiting Court signature on Permanent Injunction); and
- h) Jae Man Yoo.

**B. Plaintiffs Are in the Process of Signing Settlement Agreements with Numerous Defendants**

Plaintiffs are in the process of signing Settlement Agreements and Permanent Injunctions with the following Defendants:

- a) Joseph a/k/a Jose Doe a/k/a Jose Chong Wen a/k/a Jose Ching Wen
- b) Carlos Doe a/k/a Carlos Rene Tse Sio
- c) Fu Alejandro Chang
- d) Yan Fen Chen a/k/a Yan Sen Chen
- e) Catse Co., Inc.; and
- f) Yan He Xia a/k/a Yang He Xia.

**C. Plaintiffs Are in Ongoing Settlement Discussions with Certain Defendants**

The following Defendants are in ongoing settlement Discussions with Plaintiffs:

- a) Ken Chen a/k/a Shu Chen a/k/a Xiang Chen
- b) Goddess Trading d/b/a Goddesstrading@hotmail.com
- c) Daniel Doe
- d) Chen X. Jiang
- e) Lin Lin Nan a/k/a Corina Doe a/k/a Qimiao Hu a/k/a Qi Miao Hu d/b/a qimiaoh@hotmail.com
- f) Xianxn Cai
- g) Joey's Gift Shop, Inc.
- h) Ling Cai
- i) Cheng Chen
- j) Chen Star Gift Shop; and

k) Song Gao and Lisa Wu d/b/a Quick Global Shipping.

We are hopeful that we will finalize all settlements within ninety days.

**D. Plaintiffs Intend to Seek Default or Summary Judgment Against the Remaining Defendants**

Plaintiffs intend to request a brief ninety day extension of the scheduled trial date and believe that if such extension is granted, Plaintiffs will be able conclude negotiations with the remaining answering Defendants and seek default or summary judgment, as appropriate, against the remaining Defendants.

Dated: April 11, 2008

Respectfully submitted,  
GREENBERG TRAURIG LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties, either via transmission of Notices of Electronic Filing generated by CM/ECF and/or by first class mail as follows:

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